

Anderson.

Claims 1 and 3 have been rewritten to specify that the permanent media belt is a woven fabric material and is freely movable along its recirculation path around the bottom of the tank.

The filters of both Anderson and Estabrook are of a different type from that of Bratten. Specifically, in both Anderson and Estabrook the filter is conveyed through the tank by means of the underlying conveyor which conveyor is constituted by a Cambridge belt having a relatively large openings, i.e., 1/2 inch by 1 inch formed by a metallic mesh. Accordingly, the conveyors of Estabrook and Anderson are not themselves filter media and cannot function as filter media and are not constituted by a woven fabric material.

In each case, the underlying conveyor is powered to advance the overlying filter belt.

Anderson is additionally different from Estabrook and Bratten inasmuch as the conveyor belt provides the perforated plate support during the filtering action receiving the liquid flow after having past through the filter media belt.

The Bratten reference shows a filter media of the type in which there is a frictional drive of a filter media belt by an overlying side loops of a chain conveyor extending across the width of the filter media belt and having the bottom segment thereof frictionally engaging the upper surface of the filter media belt to create both the frictional engagement necessary for driving of the filter belt but also engaging the side edges thereof to produce a sealing of the filter belt edges.

Accordingly, since there is already present in the filter apparatus of Bratten a filter belt drive arrangement consisting of the overhead chain conveyor there would be no suggestion to one of ordinary skill in the art to add an underlying conveyor consisting of a powered Cambridge belt. In fact, if there was an underlying powered belt this would be entirely redundant and could conceivably lead to problems if the speed of the overhead conveyor and the underlying Cambridge belt powered conveyor was not precisely synchronized as scrapping and bunching of the intermediate filter belt would result in problems. In any event, a power recirculated underlying Cambridge belt would be entirely redundant in Bratten.

Inasmuch as both claims 1 and 3 recite that the permanent media filter belt is of a woven fabric construction it further distinguishes over the proposed combination even if such proposed combination of the Bratten, Estabrook, and Anderson filter apparatus were made, as the Cambridge belt could not be deemed a woven fabric filter media.

The claimed invention is specific to the overhead chain conveyor friction drive filter in which an underlying filter belt is advanced by the frictional engagement with the chain conveyor, and also with the edges sealed thereto by the side loops of the chain conveyor.

As set forth in the specification, the practice heretofore has not involved an arrangement of recirculating the filter belt beneath the tank in this type of filter.

Reference is made to the Galletti patent cited by the

Examiner, U.S. patent 5,118,420 as an example of the type of filter with which the present invention is concerned. The first embodiment described in Galletti is one in which the permanent media belt is recirculated within the tank but beneath the vacuum box. While this does produce a divergency of the paths of the chain conveyor and permanent filter belt at one end of the tank, it can be seen that the removal of the filtered solids is rendered more difficult and increases the complexity of the tank configuration. Furthermore, the filter belt cannot easily be scraped and washed.

In the second embodiment of Galletti, the filter belt is recirculated instead across the top of the tank above the chain conveyor blocking access from the top of the tank and also precluding the use of a disposable media.

Accordingly, those skilled in the art have not heretofore recognized the advantages achieved in the chain conveyor driven filter of the type shown in the Bratten patent of record to establish a filter belt recirculation external to and beneath the tank.

Claims 4-7 stand as rejected under 35 USC 103 as being unpatentable over Bratten in view of Estabrook and Anderson as applied to claims 1-3 and 8 and 9 taken further in view of Ishigaki again the Ishigaki is concerned with a different filter arrangement and hence does not supply the teaching of the improved result achieved in the Bratten chain conveyor type filters with the specific arrangement recited in claims 1-3, i.e., the effective

arrangement allows access to the permanent filter media belt for scraping and washing thereof.

Accordingly, reconsideration of the rejection of claim 1-11 is respectfully requested. A correction to Figure 2 is proposed in the accompanying Letter in which the omitted numerals 74 mentioned in the text are to be added as shown in red on the sketch accompanying the Letter.

Favorably reconsideration is respectfully requested.

Respectfully submitted,

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